# IN THE DRAWINGS:

Please replace FIG. 2 with the replacement drawing attached hereto in which a slot into which the detachable auxiliary memory 222 is identified with reference numeral 222a.

### **REMARKS**

In accordance with the foregoing, FIG. 1 and paragraph [0016] of the specification have been amended, while claim 3 has been amended and claim 45 has been added. No new matter is being presented. Therefore, claims 1-3 and 6-45 are pending and reconsideration is respectfully requested.

#### AMENDMENTS TO PARAGRAPH [0016] OF THE SPECIFICATION AND FIG. 2:

As noted above, FIG. 2 and paragraph [0016] of the specification have been amended. In detail, slot 222a, into which the detachable auxiliary memory is removable inserted, has been identified with reference numeral "222a." This does not represent new matter because the amendments merely identify a term and a reference numeral for a feature that was included in the as-filed application. Appropriate consideration thereof is, therefore, respectfully requested.

#### REJECTIONS UNDER 35 U.S.C. §103:

Claims 1-3, 7-10, 14-15, 17-18, 22-24, 31-34, 38-39 and 44 are rejected under 35 U.S.C. §103(a) as being unpatentable over Alberth, Jr. et al (U.S. Patent 6,021,332) in view of Sawada et al (U.S. Patent 6,810,274), claims 16 and 40, are rejected under 35 U.S.C. §103(a) as being unpatentable over Alberth, Jr. et al (U.S. Patent 6,021,332) in view of Sawada et al (U.S. Patent 6,810,274) and further in view of Wang (U.S. Publication 2003/0013506), claims 6, 13 and 41-43 are rejected under 35 U.S.C. §103(a) as being unpatentable over Alberth, Jr. et al (U.S. Patent 6,021,332) in view of Sawada et al (U.S. Patent 6,810,274) and further in view of Miyashita (U.S. Patent 6,244,894), claim 12 is rejected under 35 U.S.C. §103(a) as being unpatentable over Alberth, Jr. et al (U.S. Patent 6,021,332) in view of Sawada et al (U.S. Patent 6,810,274), in view of Austin et al (U.S. Patent 6,590,303) and further in view of Griffith et al (U.S. Patent 6,917,280), claims 11, 25-30 and 35-37 are rejected under 35 U.S.C. §103(a) as being unpatentable over Alberth, Jr. et al (U.S. Patent 6,021,332) in view of Sawada et al (U.S. Patent 6,810,274) and further in view of Austin et al (U.S. Patent 6,590,303), and claims 19 and 21 are rejected under 35 U.S.C. §103(a) as being unpatentable over Wang (U.S. Publication 2003/0013506) in view of Sawada et al (U.S. Patent 6,810,274). These rejections are traversed.

Regarding the above-noted rejections, it is noted that all previous arguments for allowability are reiterated and incorporated herein. In addition, the following arguments are set forth.

According to page 2 of the outstanding Office Action, the Examiner disagrees with the applicants' position that the addition of the auxiliary memory of Sawada would be redundant and that, therefore, it is unclear why anyone skilled in the art would conclude that the suggested modification of Alberth would be beneficial. In support of this position, the Examiner notes that Sawada discloses a detachable memory that can protect data stored in the semiconductor memories of the IC card of Alberth. The Examiner further notes that while Alberth lacks a teaching of a detachable memory, Sawada makes up for the deficiency.

Thus, it is the applicants' position that the central issue in question remains unresolved. That is, regardless of whether Sawada provides a teaching of a detachable memory that is not included in the reference to Alberth, it is unclear that the suggested modification of Alberth would be beneficial since Alberth provides no indication that a detachable memory is necessary for its operation. As such, it is unclear that the suggested combination is proper or that the claimed invention would have been obvious.

Specifically, in Alberth, the data stored in the memories 402 and 410 of the main battery 101 and the supplementary module 102, respectively, are never in danger of being unprotected due to a lack of a power source thereby necessitating a detachable memory. Indeed, Alberth discloses that the supplementary module is used "to avoid interruption in operation" and that the radio telephone "automatically switches between the main battery 101 and the auxiliary battery of the supplemental module 102." In other words, the presence of the supplemental module 102 insures that power is available to maintain the saving of any data during operation of the radiotelephone and, as a result, data is protected. Thus, as has been noted previously, the addition of the auxiliary memory of Sawada is redundant in view of the data storage ability provided by the auxiliary battery.

Thus, applicants respectfully assert that the rejections listed above are overcome and that the claims are, therefore, allowable.

#### **RESPONSE TO EXAMINER'S AUGUST 9, 2006 COMMENTS:**

Regarding the Examiner's comments as to why the previously filed response does not place the application into allowance, it is noted that apparently the Examiner's position is that the teachings of Sawada should be combined with those of Alberth because adding a detachable auxiliary memory will reduce the size of the wireless telephone set. In response, applicants note that they are at a loss to understand how adding a detachable memory to Alberth will somehow

reduce the size of the device disclosed by Alberth.

Is it the Examiner's position that either the memory or the auxiliary memory of Alberth should be made to be detachable so as to reduce the size of the Alberth device? If so, it is requested that the Examiner explain the causal relationship between the suggested modifications (i.e., making the memory or the auxiliary memory detachable) and the apparently desired result (reducing the size of the Alberth device)? Applicants' simple intuition suggests that the suggested modification of Alberth would actually increase the size and the complexity of the Alberth device due to the need for additional mechanical structures that allow for the memory or the auxiliary memory to be detachable.

In any case, it is respectfully requested that answers to these questions be provided in the next Office Action if the rejections of the claims are maintained despite the arguments provided above and previously.

#### **ADDITION OF NEW CLAIM 45:**

Briefly, it is noted that claim 45 has been added and recites an electronic device comprising a body and a battery that is removably coupled to the body to supply current to the body and to provide storage for information for the electronic device. According to the claim the battery comprises a built-in and detachable semi-conductor memory chip having an initial recording capacity on which the information is recorded, a fixed block to which the main memory is detachably attached, a detachable auxiliary memory card to expand the recording capacity, if necessary, according to a predetermined capacity requirement of the information, and a slot into which the detachable auxiliary memory card is removably inserted. It is further noted that none of the cited references disclose these features and that no combination of the cited references is possible to cure the defects of each individual reference.

## **CONCLUSION:**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited. If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters. Finally, if there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

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